UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE: : CHAPTER 13

GEORGE AND DOLORES STARETZ

Debtor(s) : CASE NO. 19-14972

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## **DEBTORS' ANSWER TO TRUSTEE'S MOTION TO DISMISS**

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AND NOW COMES, George and Dolores Staretz, the Debtors, and files an Answer to the Trustee's Motion to Dismiss and states the following:

- 1. On August 07, 2019, George and Dolores Staretz, (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Eastern District of Pennsylvania.
  - 2. Scott F. Waterman, Esq. is the standing Chapter 13 Trustee.
- 3. On April 08, 2020, the Trustee filed a Motion to Dismiss the Debtor's Chapter 13 case due to material default.
- 4. Debtors counsel is attempting to contact the Debtors to discuss the matter and to find out the status of the Trustee payments.

WHEREFORE, the Debtors respectfully request that Trustee's Motion to Dismiss be denied.

Respectfully submitted,

Date: April 22, 2020 /s/Tullio DeLuca

Tullio DeLuca, Esquire PA ID# 59887 381 N. 9<sup>th</sup> Avenue Scranton, Pa 18504 (570) 347-7764

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CERTIFICATE OF SERVICE			
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The undersigned hereby certifies that on April 22, 2020, he caused a true and correct copy of			
Debtors' Answer to Trustee's Motion to Dismiss to be served via electronic filing in the above-referenced			
case, on the following:			
Rolando Ramos, Esq. at <a href="mail@Readingch13.com">ECFmail@Readingch13.com</a>			

Dated: April 22, 2020

/s/Tullio DeLuca
Tullio DeLuca, Esquire